

**REMARKS/ARGUMENTS**

Reconsideration and withdrawal of the outstanding grounds of rejection is respectfully requested in light of the above amendments and the remarks that follow.

At the outset, applicant gratefully acknowledges the Examiner's indication that claims 7-20 have been allowed and that claims 4-6 contain allowable subject matter. By this amendment, claims 4 and 5 have been rewritten in independent form, thereby placing claims 4-6 (claim 6 depends from claim 5) in condition for allowance along with claims 7-20.

The Examiner has rejected claim 1 under 35 U.S.C. 102 as anticipated by Askew. The Examiner characterizes Askew as disclosing a circuit board 10 having a polymer sheet 20 and potting material 22, 28, apparently referring to the embodiments in Figures 2 and 3.

By this amendment, applicant has incorporated the limitations of original dependent claim 3 into claim 1 along with further minor amendments, for example, recharacterizing the sheet 46 as a film consistent with the specification (see page 5, paragraph 14). In Askew, the circuit board 10 on which the electronic component 12 is mounted is not "encapsulated" within a potting material. Note that the entire lower surface of the circuit board remains exposed. In addition, it does not appear that the primary layer 20 in Askew can reasonably be described as a thin polymer film. Note that the polymer material 20 in Askew is intended to encapsulate at least one side of the electronic component 12 and circuit board 10. Askew recognizes that the encapsulating

material 20 offers no magnetic shielding or electric shielding of the device 12 and may even include air bubbles or other imperfections. Accordingly, Askew adds a third layer 22 of composite material that is impregnated with magnetically permeable material particles covering at least the upper surface of the board, device 12 and the second polymer layer 20. It is readily apparent from a fair reading of Askew that the second polymer layer 20 is not reasonably characterized as a thin polymer film, much less a film having a thickness of from about .015 to .030 inch. In fact, it would appear that any such thin film would be incapable of functioning in the manner intended by the polymer layer 20, i.e., not only to protect the device 12 from possible oxidation but to also help maintain the structural integrity of the device 12, bond wires 14 and contacts 16 and 18. This is in stark contrast to the present invention where the thin film polymer is employed as a safe path for cracks to form along and to follow without sacrificing the functionality of either the potting material or the circuit board. In this regard, note the disclosure on page 2 of the instant specification where it is stated that:

In other words, the TEFLON® film acts as the path of least resistance for the crack or cracks. Moreover, potting material does not adhere to the surface of the TEFLON® film. As a result, the crack shield "appears" to the crack as simply a large void in the potting matrix. The edges of this void present large stress concentrations in safe locations which, when fractured, serve as a stress relief for the system.

Thus, the problem solved by the instant invention, which is far removed from the problem addressed in Askew, provides an unobvious rationale for utilizing a film of the specified thickness. In other words, it is improper in this instance for the Examiner


simply to conclude obvious matter of choice with respect to the thickness of the polymer film. Accordingly, independent claim 1 clearly distinguishes over the Askew patent.

The Examiner has rejected claims 2 and 3 as unpatentable over Askew. Insofar as the limitations of dependent claim 3 have been incorporated into claim 1, the rejection is moot as to the now cancelled claim 3. Dependent claim 2 is patentable by reason of its dependence upon claim 1 but, in addition, the choice of polytetrafluoroethylene as the material of choice for the polymer film is significant in that the film does not adhere to the potting material (see the text quoted above as well as the text on page 6 of the specification).

For the above reasons, it is respectfully submitted that claims 1 and 2 are now in condition for immediate allowance along with claims 4-20. In the event, however, any small matters remain outstanding, the Examiner is encouraged to telephone the undersigned so that the prosecution of this application can be expeditiously concluded.

Respectfully submitted,

**NIXON & VANDERHYE P.C.**

By:   
Michael J. Keenan  
Reg. No. 32,106

MJK:ljb  
1100 North Glebe Road, 8th Floor  
Arlington, VA 22201-4714  
Telephone: (703) 816-4000  
Facsimile: (703) 816-4100